

**PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS  
HERETO TO DETERMINE WHETHER THIS OBJECTION  
AFFECTS YOUR CLAIM(S)**

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Attorneys for Debtors  
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.  
: :  
MOTORS LIQUIDATION COMPANY, *et al.* : 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* :  
: :  
Debtors. : (Jointly Administered)  
: :  
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**NOTICE OF DEBTORS' NINETY-EIGHTH OMNIBUS OBJECTION TO CLAIMS**  
(Incorrectly Classified Claims)

**PLEASE TAKE NOTICE** that on September 21, 2010, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the “**Debtors**”), filed their ninety-eighth omnibus objection to reclassify certain claims (the “**Ninety-Eighth Omnibus Objection to Claims**”), and that a hearing (the “**Hearing**”) to consider the Ninety-Eighth Omnibus Objection to Claims will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New

York 10004, on **October 26, 2010 at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE NINETY-EIGHTH OMNIBUS OBJECTION TO CLAIMS TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN EXHIBIT "A" ANNEXED THERETO.**

**PLEASE TAKE FURTHER NOTICE** that any responses to the Ninety-Eighth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman,

Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.), so as to be received no later than **October 19, 2010 at 4:00 p.m. (Eastern Time)** (the "**Response Deadline**").

**PLEASE TAKE FURTHER NOTICE** that if no responses are timely filed and served with respect to the Ninety-Eighth Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Ninety-Eighth Omnibus

Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York  
September 21, 2010

/s/ Joseph H. Smolinsky

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Joseph H. Smolinsky

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.  
: :  
MOTORS LIQUIDATION COMPANY, *et al.* : 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* :  
: :  
Debtors. : (Jointly Administered)  
: :  
-----x

**DEBTORS' NINETY-EIGHTH OMNIBUS OBJECTION TO CLAIMS**  
(Incorrectly Classified Claims)

THIS OBJECTION SEEKS TO RECLASSIFY CERTAIN FILED PROOFS OF CLAIM.  
CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE  
EXHIBIT ANNEXED TO THIS OBJECTION.

TO THE HONORABLE ROBERT E. GERBER,  
UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) ("MLC") and its affiliated debtors, as debtors in possession (collectively, the "Debtors"), respectfully represent:

**Relief Requested**

1. The Debtors file this ninety-eighth omnibus objection to certain claims (the “**Ninety-Eighth Omnibus Objection to Claims**”) pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) [Docket No. 4180], seeking entry of an order reclassifying the claims listed on **Exhibit “A”** annexed hereto so that they properly conform to the priority and classification schemes set forth in the Bankruptcy Code.<sup>1</sup>

2. The Debtors have examined the proofs of claim identified on Exhibit “A” hereto and have determined that the proofs of claim listed under the heading “*Claims to be Reclassified*” (collectively, the “**Incorrectly Classified Claims**”) are claims that are not entitled to secured status because they are not secured by a lien on property in which the estate has an interest or subject to a right of setoff under section 553 of the Bankruptcy Code, nor are they entitled to administrative and/or priority status under any of the subsections of section 503 or section 507(a) of the Bankruptcy Code. Further, the Debtors reserve all of their rights to object on any other basis to any Incorrectly Classified Claims as to which the Court does not grant the relief requested herein.

3. With respect to this Ninety-Eighth Omnibus Objection to Claims, the Debtors reserve all their rights to object on any other basis to any Incorrectly Classified Claim.

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<sup>1</sup> Creditors can obtain copies of the cover page of any proof of claim filed against the Debtors’ bankruptcy estates on the Debtors’ claims register on the website maintained by the Debtors’ claims agent, [www.motorsliquidation.com](http://www.motorsliquidation.com). A link to the claims register is located under the “Claims Information” tab. Creditors without access to the Internet may request a copy of the cover page of any proof of claim by mail to The Garden City Group, Inc., Motors Liquidation Company Claims Agent, P.O. Box 9386, Dublin, Ohio 43017-4286 or by calling The Garden City Group, Inc. at 1-703-286-6401.

### **Jurisdiction**

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

### **Background**

5. On June 1, 2009, four of the Debtors (the “**Initial Debtors**”)<sup>2</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, and on October 9, 2009, two additional Debtors (the “**Realm/Encore Debtors**”)<sup>3</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, which cases are jointly administered with those of the Initial Debtors under Case Number 09-50026 (REG). On September 15, 2009, the Initial Debtors filed their schedules of assets and liabilities and statements of financial affairs, which were amended on October 4, 2009. On October 15, 2009, the Realm/Encore Debtors filed their schedules of assets and liabilities and statements of financial affairs.

6. On September 16, 2009, this Court entered an order [Docket No. 4079] establishing November 30, 2009 as the deadline for each person or entity to file a proof of claim in the Initial Debtors’ cases, including governmental units. On December 2, 2009, this Court entered an order [Docket No. 4586] establishing February 1, 2010 as the deadline for each person or entity to file a proof of claim in the Realm/Encore Debtors’ cases (except governmental units, as defined in section 101(27) of the Bankruptcy Code, for which the Court established April 16, 2010 as the deadline to file proofs of claim).

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<sup>2</sup> The Initial Debtors are Motors Liquidation Company (f/k/a General Motors Corporation), MLCS, LLC (f/k/a Saturn, LLC), MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation), and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.).

<sup>3</sup> The Realm/Encore Debtors are Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

7. Furthermore, on October 6, 2009, this Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 100 claims at a time, under various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

**The Relief Requested Should Be Approved by the Court**

8. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida, Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009), *aff’d*, No. 09 Civ. 2229 (DC), 2010 WL 234827 (S.D.N.Y. Jan. 22, 2010); *In re Adelphia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660, at \*15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000). Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1).

9. Section 506(a) of the Bankruptcy Code defines a “secured claim,” in relevant part, as an “allowed claim of a creditor secured by a lien on property in which the estate has an interest, or that is subject to setoff under section 553 . . . to the extent of the value of such creditor’s interest in the estate’s interest in such property . . . .” *Id.* § 506(a).

10. Section 507 of the Bankruptcy Code outlines the specific types of claims that are entitled to priority over other general unsecured claims asserted against a debtor.

11. Section 503 of the Bankruptcy Code establishes an administrative expense priority for certain enumerated categories of estate expenses.

12. The Debtors have reviewed and determined that each Incorrectly Classified Claim improperly asserts that it is a secured, administrative, and/or priority claim as indicated in the “*Note*” below each Incorrectly Classified Claim listed on Exhibit “A.” The Incorrectly Classified Claims (i) are not secured by a lien on property in which the estate has an interest or subject to setoff under section 553 of the Bankruptcy Code, (ii) are not entitled to administrative expense status under any of the subsections of section 503 of the Bankruptcy Code, and/or (iii) are not entitled to priority status under any of the subsections of section 507(a) of the Bankruptcy Code. Accordingly, the Debtors request that the Court enter an order reclassifying the secured, administrative, and/or priority portions of each Incorrectly Classified Claim as indicated on Exhibit “A.”

**Notice**

13. Notice of this Ninety-Eighth Omnibus Objection to Claims has been provided to each claimant listed on Exhibit “A” and parties in interest in accordance with the Fourth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated August 24, 2010 [Docket No. 6750]. The Debtors submit that such notice is sufficient and no other or further notice need be provided.

14. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: New York, New York  
September 21, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky

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Attorneys for Debtors  
and Debtors in Possession

**EXHIBIT A**

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
AMERICAN NATIONAL PROPERTY & CASUALTY	69868	Motor Liquidation Company	\$0.00 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
ANPAC ATTN: SUBROGATION / 36A1WR981 1949 E SUNSHINE SPRINGFIELD, MO 65899			\$5,099.00 (P) \$0.00 (U) \$5,099.00 (T)	\$0.00 (P) \$5,099.00 (U) \$5,099.00 (T)		
Official Claim Date: 1/26/2010						

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

ANJARI D ESTEVEZ	70008	Motor Liquidation Company	\$5,780.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,780.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
3024 N POWERS DR APT 107						
ORLANDO, FL 32818						
Official Claim Date: 2/8/2010			\$5,780.00 (T)	\$5,780.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

ASHLEY ROSS	69746	Motor Liquidation Company	\$3,946.54 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,946.54 (U)	Incorrectly Classified Claim	Pgs. 1-5
2806 1/2 MANSFIELD						
HOUSTON, TX 77091						
Official Claim Date: 1/11/2010			\$3,946.54 (T)	\$3,946.54 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

BARDWELL, THOMAS	13940	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$378.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$378.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
3540 N HURDS CORNER RD STE 1						
CARO, MI 48723						
Official Claim Date: 10/20/2009			\$378.00 (T)	\$378.00 (T)		

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to priority treatment under section 507 of the Bankruptcy Code.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
BARRERA, DAVID 244 EMERALD LN BROWNSVILLE, TX 78520	25357	Motor Liquidation Company	\$7,500.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$7,500.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/13/2009			\$7,500.00 (T)	\$7,500.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

BIO-SERV CORPORATION DBA ROSE PEST SOLUTIONS PO BOX 309 TROY, MI 48099	36731	Motor Liquidation Company	\$0.00 (S) \$1,409.00 (A) \$0.00 (P) \$4,644.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$6,053.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/23/2009			\$6,053.00 (T)	\$6,053.00 (T)		

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to administrative expense treatment under the Bankruptcy Code

BLALOCK, JENNIFER 10220 WOODVILLE RD KEVIL, KY 42053	26669	Motor Liquidation Company	\$15,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$15,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/16/2009			\$15,000.00 (T)	\$15,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

CAMPOS, ALBERTO 10803 RANCHLAND FOX SAN ANTONIO, TX 78245	70021	Motor Liquidation Company	\$4,270.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$4,270.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 2/4/2010			\$4,270.00 (T)	\$4,270.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
CAREY KAREN	60264	Motor Liquidation Company	\$0.00 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
CAREY, KAREN 2007 TREE TOP CT GRANBURY, TX 76049			\$30,000.00 (P) \$0.00 (U)	\$0.00 (P) \$30,000.00 (U)		
Official Claim Date: 11/27/2009			\$30,000.00 (T)	\$30,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status under the Bankruptcy Code. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

CASILLAS, DAVID	63279	Motor Liquidation Company	\$3,000.00 (S) \$0.00 (A) \$0.00 (P) \$5,000.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$8,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
812 LINDSAY DR MODESTO, CA 95356						
Official Claim Date: 11/30/2009			\$8,000.00 (T)	\$8,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

Christy Gresens	69483	Motor Liquidation Company	\$500.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$500.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
3161 Primrose Lane Green Bay, WI 54313 UNITED STATES OF AMERICA						
Official Claim Date: 12/16/2009			\$500.00 (T)	\$500.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

CHUO SPRING CO LTD	6360	Motor Liquidation Company	\$0.00 (S) \$46.42 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$46.42 (U)	Incorrectly Classified Claim	Pgs. 1-5
MAKI ZAFFUTO 2600 HAPPY VALLEY RD GLASGOW, KY 42141						
Official Claim Date: 10/8/2009			\$46.42 (T)	\$46.42 (T)		

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to administrative expense treatment under the Bankruptcy Code

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
CLINE TERRY	21898	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$250,000.00 (U) \$250,000.00 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$250,000.00 (U) \$250,000.00 (T)	Incorrectly Classified Claim	Pgs. 1-5
CLINE, SUSAN 1609 WARWOOD AVE WHEELING, WV 26003						
Official Claim Date: 11/9/2009						

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status under the Bankruptcy Code. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

CROSSROADS BANK F/K/A FIRST FEDERAL SAVINGS BANK OF WABASH	7662	Motor Liquidation Company	\$102,141.60 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$102,141.60 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$102,141.60 (U) \$102,141.60 (T)	Incorrectly Classified Claim	Pgs. 1-5
CROSSROADS BANK C/O TIEDE METZ & DOWNS PC 99 WEST CANAL ST WABASH, IN 46992						
Official Claim Date: 9/25/2009						

Note: This claim arises from the rejection of an executory contract. It is not secured by property of the Debtors' estates nor is it entitled to priority status. Pursuant to section 502(g) the Bankruptcy Code this claim is only entitled to a non-priority, general unsecured claim

CUNO INCORPORATED	1213	Motor Liquidation Company	\$0.00 (S) \$5,630.90 (A) \$0.00 (P) \$0.00 (U) \$5,630.90 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,630.90 (U) \$5,630.90 (T)	Incorrectly Classified Claim	Pgs. 1-5
ATTN PATTY L E MEAGHER C/O 3M LEGAL AFFAIRS PO BOX 33428 ST PAUL, MN 55133						
Official Claim Date: 8/25/2009						

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to administrative expense treatment under the Bankruptcy Code

D & M CONTRACTING CO	31227	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$67,869.16 (P) \$0.00 (U) \$67,869.16 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$67,869.16 (U) \$67,869.16 (T)	Incorrectly Classified Claim	Pgs. 1-5
PO BOX 362 RANDOLPH, OH 44265						
Official Claim Date: 11/20/2009						

Note: This claim is for services performed prepetition and is not entitled to priority treatment under section 507 of the Bankruptcy Code. Accordingly, this claim should be reclassified as a general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
DARREL HETZLER  3748 N. LAKE SHORE DR. JAMESTOWN, OH 45335 UNITED STATES OF AMERICA	69578	Remediation And Liability Management Company, Inc.	\$414.90 (S)  \$0.00 (A)  \$0.00 (P)  \$0.00 (U)  \$414.90 (T)	\$0.00 (S)  \$0.00 (A)  \$0.00 (P)  \$414.90 (U)  \$414.90 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 12/21/2009						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

DAVID STRIPLIN  813 WHEELING AVE KANSAS CITY, MO 64125	70047	Motors Liquidation Company	\$400.13 (S)  \$0.00 (A)  \$0.00 (P)  \$0.00 (U)  \$400.13 (T)	\$0.00 (S)  \$0.00 (A)  \$0.00 (P)  \$400.13 (U)  \$400.13 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 2/20/2010						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

DAVIS, JUANITA  1011 ALAMEDA AVE YOUNGSTOWN, OH 44510	68222	Motors Liquidation Company	\$28,000.00 (S)  \$0.00 (A)  \$0.00 (P)  \$17,000.00 (U)  \$45,000.00 (T)	\$0.00 (S)  \$0.00 (A)  \$0.00 (P)  \$45,000.00 (U)  \$45,000.00 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 12/2/2009						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

DEMETER SHERRI  1370 SANIBEL LN GULF BREEZE, FL 32563	67663	Motors Liquidation Company	\$5,000.00 (S)  \$0.00 (A)  \$0.00 (P)  \$0.00 (U)  \$5,000.00 (T)	\$0.00 (S)  \$0.00 (A)  \$0.00 (P)  \$5,000.00 (U)  \$5,000.00 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 12/1/2009						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
DETROIT WATER & SEWERAGE DEPARTMENT 735 RANDOLPH ST 4TH FLOOR DETROIT, MI 48226	23034	Motor Liquidation Company	\$4,939.45 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$4,939.45 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$4,939.45 (U) \$4,939.45 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/12/2009						

Note: This claim is for goods and/or services and is not secured by property of the Debtors' estates.

DETROIT WATER & SEWERAGE DEPARTMENT 735 RANDOLPH ST 4TH FLOOR DETROIT, MI 48226	23035	Motor Liquidation Company	\$423,595.65 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$423,595.65 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$423,595.65 (U) \$423,595.65 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/12/2009						

Note: This claim is for goods and/or services and is not secured by property of the Debtors' estates.

DUANE MARINE STEERING COMMITTEE (ON BEHALF OF DUANE MARINE PRP GROUP) C/O NORMAN W BERSTEIN ESQ NW BERNSTEIN & ASSOCIATES LLC 800 WESTCHESTER AVE N319 RYE BROOK, NY 10573	59686	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$35,126.07 (P) \$0.00 (U) \$35,126.07 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$35,126.07 (U) \$35,126.07 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/27/2009						

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to priority treatment under section 507  
of the Bankruptcy Code.

EDWARD HUNTER 3200 CANFIELD RD #306 YOUNGSTOWN, OH 44511	69857	Motor Liquidation Company	\$797.02 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$797.02 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$797.02 (U) \$797.02 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 1/25/2010						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this  
claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
EPHRAIM DEARY 875 FRANKILIN ROAD APT 416 MARIETTA, GA 30067	69862	Motor Liquidation Company	\$2,500.00 (S) \$0.00 (A) \$0.00 (P) \$500.00 (U) \$3,000.00 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,000.00 (U) \$3,000.00 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 1/25/2010						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

ERIE INSURANCE PO BOX 605 MURRYSVILLE, PA 15668	70051	Motor Liquidation Company	\$7,535.82 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$7,535.82 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$7,535.82 (U) \$7,535.82 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 2/22/2010						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

ESKRIDGE, RALPH PO BOX 9907 KANSAS CITY, MO 64134	69621	Motor Liquidation Company	\$2,300.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$2,300.00 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,300.00 (U) \$2,300.00 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 12/22/2009						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

ESPINOZA, ENRIQUE 1060 MADISON CHASE APT 5 WEST PALM BEACH, FL 33411	20092	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$4,500.00 (P) \$0.00 (U) \$4,500.00 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$4,500.00 (U) \$4,500.00 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/5/2009						

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status under the Bankruptcy Code. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
ESPOSITO ELISABETH	8351	Motor Liquidation Company	\$5,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
ESPOSITO, ELISABETH 228 AMBASSADOR LN GREENUP, KY 41144						
Official Claim Date: 10/12/2009			\$5,000.00 (T)	\$5,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

EUGENE CARROLL	70056	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$852.14 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$852.14 (U)	Incorrectly Classified Claim	Pgs. 1-5
236 WICKERSHAM RD OXFORD, PA 19363						
Official Claim Date: 2/22/2010			\$852.14 (T)	\$852.14 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

FANCHER, DAVID	67976	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$7,500.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$7,500.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
153 MANCHESTER ST APT 16 CONCORD, NH 03301						
Official Claim Date: 12/1/2009			\$7,500.00 (T)	\$7,500.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

FANNIN, CARLA	68137	Motor Liquidation Company	\$2,091.60 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,091.60 (U)	Incorrectly Classified Claim	Pgs. 1-5
6306 LONE STAR RD NORTH ZULCH, TX 77872						
Official Claim Date: 12/2/2009			\$2,091.60 (T)	\$2,091.60 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
FOISTNER, JOSEPH A	17743	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$16,500,000.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$16,500,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
3 FOXBERRY DR NEW BOSTON, NH 03070						
Official Claim Date: 10/26/2009			\$16,500,000.00 (T)	\$16,500,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status under the Bankruptcy Code. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

FORD MOTOR COMPANY	1280	Motor Liquidation Company	\$2,029,836.70 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,029,836.70 (U)	Incorrectly Classified Claim	Pgs. 1-5
C/O JONATHAN S GREEN MILLER CANFIELD PADDOCK & STONE PLC 150 W JEFFERSON AVE SUITE 2500 DETROIT, MI 48226						
Official Claim Date: 9/11/2009			\$2,029,836.70 (T)	\$2,029,836.70 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

GARY ENNIS	69793	Environmental Corporate Remediation Company, Inc.	\$577.98 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$577.98 (U)	Incorrectly Classified Claim	Pgs. 1-5
631 CHIC ENNIS RD BENSON, NC 27504						
Official Claim Date: 1/19/2010			\$577.98 (T)	\$577.98 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

GARY ENNIS	69794	Remediation And Liability Management Company, Inc.	\$534.13 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$534.13 (U)	Incorrectly Classified Claim	Pgs. 1-5
631 CHIC ENNIS RD BENSON, NC 27504						
Official Claim Date: 1/19/2010			\$534.13 (T)	\$534.13 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
GASKINS, ELIZABETH 440 BOWEN ST SAVANNA, IL 61074	63419	Motor Liquidation Company	\$31,521.95 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$31,521.95 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/30/2009			\$31,521.95 (T)	\$31,521.95 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

GOLDSMITH, DWAYNE 6934 ATHA DR DALLAS, TX 75217	68797	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$4,700.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$4,700.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 12/4/2009			\$4,700.00 (T)	\$4,700.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

GOODWIN, MARILYN 20015 DOWNS RD PARKTON, MD 21120 UNITED STATES OF AMERICA	67750	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$2,425.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,425.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 12/1/2009			\$2,425.00 (T)	\$2,425.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

HANOVER INSURANCE GROUP C/O JULIE CARLE PO BOX 15149 WORCESTER, MA 01615	69867	Motor Liquidation Company	\$26,470.85 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$26,470.85 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 1/25/2010			\$26,470.85 (T)	\$26,470.85 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
HEAD WILLIAM 3885 FAVERSHAM RD CLEVELAND, OH 44118	67620	Motor Liquidation Company	\$1,422.05 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,422.05 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 12/1/2009			\$1,422.05 (T)	\$1,422.05 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

HU, TED ASSOCIATES INC EFT G 8285 S SAGINAW STE 9 GRAND BLANC, MI 48439	15683	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$9,750.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$9,750.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 10/26/2009			\$9,750.00 (T)	\$9,750.00 (T)		

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to priority treatment under section 507 of the Bankruptcy Code.

HUNTER, DOROTHY 1903 N TYLER ST MIDLAND, TX 79705	26790	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$100,000.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$100,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/16/2009			\$100,000.00 (T)	\$100,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates, and it is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

INFRASTRUCTURE INC ATTN: CORPORATE OFFICER/AUTHORIZED AGENT 1802 HAYES ST NASHVILLE, TN 37203	16646	Motor Liquidation Company	\$0.00 (S) \$2,779.92 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,779.92 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 10/26/2009			\$2,779.92 (T)	\$2,779.92 (T)		

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to administrative expense treatment under the Bankruptcy Code

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
JOHN JOHNSON 7012 REDWOOD DRIVE COLUMBUS, GA 31904	70060	Motor Liquidation Company	\$3,300.00 (S) \$0.00 (A) \$0.00 (P) \$4,000.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$7,300.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 2/24/2010			\$7,300.00 (T)	\$7,300.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

JOHNSON, CAROLYN 14106 CONCORD MEADOW LN HOUSTON, TX 77047	12032	Motor Liquidation Company	\$8,000.00 (S) \$0.00 (A) \$0.00 (P) \$2,000.00 (U) \$10,000.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 10/19/2009			\$10,000.00 (T)	\$10,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

JORGE VILLA 2220 W 37 ST CHICAGO, IL 60609	20987	Motor Liquidation Company	\$2,200.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$2,200.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,200.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/6/2009			\$2,200.00 (T)	\$2,200.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

JOYCE DECKER 800 E KAHLER RD WILMINGTON, IL 60481	69700	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$6,000.00 (P) \$0.00 (U) \$6,000.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$6,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 1/4/2010			\$6,000.00 (T)	\$6,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
JR MOTORSPORTS	23362	Motor Liquidation Company	\$0.00 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
KELLEY EARNHARDT 349 CAYUGA DR MOORESVILLE, NC 28117			\$31,429.00 (P) \$166,571.00 (U)	\$0.00 (P) \$198,000.00 (U)		
Official Claim Date: 11/12/2009			\$198,000.00 (T)	\$198,000.00 (T)		

Note: This claim arises from the rejection of an executory contract. It is not entitled to priority status. Pursuant to section 502(g) the Bankruptcy Code this claimant is only entitled to a non-priority, general unsecured claim.

LAKELAND BANK	6120	Motor Liquidation Company	\$65,500.00 (S) \$0.00 (A) \$0.00 (P)	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Incorrectly Classified Claim	Pgs. 1-5
250 OAK RIDGE RD OAK RIDGE, NJ 07438			\$126,369.67 (U)	\$191,869.67 (U)		
Official Claim Date: 10/8/2009			\$191,869.67 (T)	\$191,869.67 (T)		

Note: This claim arises from the rejection of an executory contract. It is not secured by property of the Debtors' estates nor is it entitled to priority status. Pursuant to section 502(g) the Bankruptcy Code this claim is only entitled to a non-priority, general unsecured claim

LARRY MADDUX	70010	Motor Liquidation Company	\$738.28 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$738.28 (U)	Incorrectly Classified Claim	Pgs. 1-5
6054 SIMIEN RD. INDIANAPOLIS, IN 46237			\$738.28 (T)	\$738.28 (T)		
Official Claim Date: 2/8/2010						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

LINDA FISHER	69960	Motor Liquidation Company	\$7,500.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$7,500.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
17904 DANIELSON ST APT 103 CANYON COUNTRY, CA 91387			\$7,500.00 (T)	\$7,500.00 (T)		
Official Claim Date: 2/1/2010						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
LISA LINDLEY	68984	Motor Liquidation Company	\$2,500.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,500.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
1231 LEXIE COBB RD NEWBERN, TN 38059						
Official Claim Date: 12/7/2009			\$2,500.00 (T)	\$2,500.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

LONNIE CHAPMAN	69688	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$8,000.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$8,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
PO BOX 1265 HAMMOND, IN 46325						
Official Claim Date: 1/4/2010			\$8,000.00 (T)	\$8,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

LOVE, JOYCE C.	3610	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$2,950.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,950.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
45 TWILLER ST 2ND FLOOR ALBANY, NY 12209						
Official Claim Date: 10/5/2009			\$2,950.00 (T)	\$2,950.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status under the Bankruptcy Code. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

MANUEL, SANDY	7417	Motor Liquidation Company	\$8,500.00 (S) \$0.00 (A) \$0.00 (P) \$1,500.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
42 GARLAND AVE ROCHESTER, NY 14611						
Official Claim Date: 10/9/2009			\$10,000.00 (T)	\$10,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
MARK VERMEERSCH 216 E RANDOLPH ST LANSING, MI 48906	19821	Motor Liquidation Company	\$81,386.09 (S) \$0.00 (A) \$0.00 (P) \$2,786.09 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$84,172.18 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/4/2009			\$84,172.18 (T)	\$84,172.18 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

MATHEW SELBY 102 MEDOWS DR TRUSSVILLE, AL 35235	69717	Motor Liquidation Company	\$350,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$350,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 1/6/2010			\$350,000.00 (T)	\$350,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

MEGAN CANTY 8146 REYNOLDSWOOD DR REYNOLDSBURG, OH 43068	28544	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$500,000.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$500,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/17/2009			\$500,000.00 (T)	\$500,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status under the Bankruptcy Code. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

MICHAEL WILEY 7188 N WEBSTER RD MOUNT MORRIS, MI 48458	21619	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$5,000,000.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,000,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/9/2009			\$5,000,000.00 (T)	\$5,000,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status under the Bankruptcy Code. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
MOREAU, JENNIFER 144 W TUNICA DR PO BOX 129 MARKSVILLE, LA 71351	68955	Motor Liquidation Company	\$459,000.00 (S) \$0.00 (A) \$0.00 (P) \$41,000.00 (U) \$500,000.00 (U) \$500,000.00 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$500,000.00 (U) \$500,000.00 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 12/7/2009						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

NAOMI BOHANNON 1258 E PRINCETON AVE FLINT, MI 48505	69971	Environmental Corporate Remediation Company, Inc.	\$55,000.00 (S) \$0.00 (A) \$9,700.00 (P) \$100,000.00 (U) \$164,700.00 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$164,700.00 (U) \$164,700.00 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 2/1/2010						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates, and it is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

NATIONAL SIGNAL CORP 47433 RYAN RD PO BOX 182003 SHELBY TOWNSHIP, MI 48318	5996	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$3,393.75 (P) \$0.00 (U) \$3,393.75 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,393.75 (U) \$3,393.75 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 10/7/2009						

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to priority treatment under section 507 of the Bankruptcy Code.

OBERG JOHN 741 BEAVER ST ROCHESTER, PA 15074	22068	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$8,000.00 (P) \$0.00 (U) \$8,000.00 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$8,000.00 (U) \$8,000.00 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/9/2009						

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status under the Bankruptcy Code. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
PAULA MARTIN	69724	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$935.58 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$935.58 (U)	Incorrectly Classified Claim	Pgs. 1-5
1654 MALDON LANE SAINT LOUIS, MO 63136						
Official Claim Date: 1/7/2010			\$935.58 (T)	\$935.58 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

PETTIES, OLIVET	68293	Motor Liquidation Company	\$6,900.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$6,900.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
PO BOX 426 LEGGETT, TX 77350						
Official Claim Date: 12/3/2009			\$6,900.00 (T)	\$6,900.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

PHILLIPS, JAMES	22208	Motor Liquidation Company	\$8,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$8,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
PO BOX 1451 INDIANOLA, MS 38751						
Official Claim Date: 11/9/2009			\$8,000.00 (T)	\$8,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

PIERSON AUTOMOTIVE, INC.	62040	Motor Liquidation Company	\$189,010.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$189,010.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
JAMES PIERSON 2424 N VERTIY PKWY MIDDLETON, OH 45042						
Official Claim Date: 11/27/2009			\$189,010.00 (T)	\$189,010.00 (T)		

Note: This claim arises from the rejection of an executory contract. It is not secured by property of the Debtors' estates nor is it entitled to priority status. Pursuant to section 502(g) the Bankruptcy Code this claim is only entitled to a non-priority, general unsecured claim

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
PIVAL INTERNATIONAL INC	63379	Motor Liquidation Company	\$0.00 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
1000 AVE ST CHARLES STE 800 CANADA VAUDREUIL-DORION PQ J7V 8P5 CANADA			\$21,459.86 (P) \$0.00 (U)	\$0.00 (P) \$21,459.86 (U)		
, CANADA			\$21,459.86 (T)	\$21,459.86 (T)		

Official Claim Date: 11/30/2009

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to priority treatment under section 507 of the Bankruptcy Code.

POLLARD, STEVE	68561	Motor Liquidation Company	\$5,995.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,995.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
5419 E 96TH ST N SPERRY, OK 74073						
Official Claim Date: 12/3/2009			\$5,995.00 (T)	\$5,995.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

R G SMITH CO INC	8979	Motor Liquidation Company	\$0.00 (S) \$3,196.00 (A) \$0.00 (P) \$6,052.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$9,248.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
1249 DUEBER AVE SW CANTON, OH 44706						
Official Claim Date: 10/13/2009			\$9,248.00 (T)	\$9,248.00 (T)		

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to administrative expense treatment under the Bankruptcy Code

RABURN, BARBARA	3893	Motor Liquidation Company	\$20,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$20,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
8525 9TH ST N ST PETERSBURG, FL 33702						
Official Claim Date: 10/5/2009			\$20,000.00 (T)	\$20,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
RENDEZVOUS MOTORS GROUP DBA TAPPER MOTORS	1034	Motor Liquidation Company	\$239,283.94 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
ATTN MICHAEL W SPENCE RAY QUINNEY & NEBEKER PC 36 SOUTH STATE STREET SUITE 1400 SALT LAKE CITY, UT 84111			\$0.00 (P) \$0.00 (U)	\$0.00 (P) \$239,283.94 (U)		
			\$239,283.94 (T)	\$239,283.94 (T)		

Official Claim Date: 7/30/2009

Note: This claim arises from the rejection of an executory contract. It is not secured by property of the Debtors' estates nor is it entitled to priority status. Pursuant to section 502(g) the Bankruptcy Code this claim is only entitled to a non-priority, general unsecured claim

RICH MUHA	69708	Motor Liquidation Company	\$618.17 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
1453 WEST ASH PLACE			\$0.00 (P)	\$0.00 (P)		
GRIFFITH, IN 46319			\$0.00 (U)	\$618.17 (U)		
UNITED STATES OF AMERICA			\$618.17 (T)	\$618.17 (T)		

Official Claim Date: 1/4/2010

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

ROSEMARY DAISEY	70094	Motor Liquidation Company	\$2,491.73 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
1209 CEDAR DRIVE			\$0.00 (P)	\$0.00 (P)		
PINE HILL, NJ 08021			\$0.00 (U)	\$2,491.73 (U)		
Official Claim Date: 3/4/2010			\$2,491.73 (T)	\$2,491.73 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

SEIBER, DORA	65645	Motor Liquidation Company	\$3,775.00 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
766 MANGUM ST 801			\$0.00 (P)	\$0.00 (P)		
CENTREVILLE, MS 39631			\$0.00 (U)	\$3,775.00 (U)		
Official Claim Date: 11/30/2009			\$3,775.00 (T)	\$3,775.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
SERRANO JENNIFER	68418	Motor Liquidation Company	\$2,354.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,354.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
FRANCISCO PIETRI 69 ABJUTAF, PR 00601						
Official Claim Date: 12/3/2009			\$2,354.00 (T)	\$2,354.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

SHERIF RAFIK KODSY	69683	Remediation And Liability Management Company, Inc.	\$15,000,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$15,000,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
15968 LAUREL OAK CIRCLE DELRAY BEACH, FL 33484						
Official Claim Date: 1/4/2010			\$15,000,000.00 (T)	\$15,000,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

SPECIALTY SERVICES	5399	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$9,475.62 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$9,475.62 (U)	Incorrectly Classified Claim	Pgs. 1-5
45 LA PORTE ST ARCADIA, CA 91006						
Official Claim Date: 10/6/2009			\$9,475.62 (T)	\$9,475.62 (T)		

Note: This claim is for services performed prepetition and is not entitled to priority treatment under section 507 of the Bankruptcy Code. Accordingly, this claim should be reclassified as a general unsecured claim.

STOUT INDUSTRIES INC	13747	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$59,240.04 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$59,240.04 (U)	Incorrectly Classified Claim	Pgs. 1-5
6425 W FLORISSANT AVE SAINT LOUIS, MO 63136						
Official Claim Date: 10/20/2009			\$59,240.04 (T)	\$59,240.04 (T)		

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to priority treatment under section 507 of the Bankruptcy Code.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
SUE PHILLIPS 3274 MONTEBELLO AVENUE SPRINGFIELD, OR 97477	68414	Motor Liquidation Company	\$63,487.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$63,487.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 12/3/2009			\$63,487.00 (T)	\$63,487.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

TAMMY THRASHER USAA INSURANCE A/S/A CHARLES FREESE P.O. BOX 659476 SAN ANTONIO, TX 78265	69954	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$4,637.79 (P) \$0.00 (U) \$4,637.79 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$4,637.79 (U) \$4,637.79 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 2/1/2010						

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

TANKSON, ANTONIA 637 E 131ST ST APT A RIVERDALE, IL 60827	69978	Motor Liquidation Company	\$2,719.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$2,719.00 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,719.00 (U) \$2,719.00 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 2/3/2010						

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

THE PROCTER & GAMBLE CO ATTN: JOHN B PERSIANI DINSMORE & SHOHL LLP 255 E 5TH ST STE 1900 CINCINNATI, OH 45202	44838	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$1,711.15 (P) \$2,488.94 (U) \$4,200.09 (T)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$4,200.09 (U) \$4,200.09 (T)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/24/2009						

Note: This claim is for goods and/or services provided by an outside vendor and is not entitled to priority treatment under section 507 of the Bankruptcy Code.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
VERLINDA CHEEK 10628 GARDENWOOD ROAD ORLANDO, FL 32837	68252	Motor Liquidation Company	\$1,500.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,500.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 12/3/2009			\$1,500.00 (T)	\$1,500.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

VERMEERSCH, MARK M 216 E RANDOLPH ST LANSING, MI 48906	19822	Motor Liquidation Company	\$81,386.09 (S) \$0.00 (A) \$0.00 (P) \$2,786.09 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$84,172.18 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/4/2009			\$84,172.18 (T)	\$84,172.18 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

WALING, LORI 311 BAPTISTE AVE MONROE, MI 48162	21438	Motor Liquidation Company	\$2,300.00 (S) \$3,000.00 (A) \$0.00 (P) \$700.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$6,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/9/2009			\$6,000.00 (T)	\$6,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates, and it is not entitled to an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

WILSON, SHIRLEY 32015 THE OLD RD CASTAIC, CA 91384	17418	Motor Liquidation Company	\$700.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$700.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 10/29/2009			\$700.00 (T)	\$700.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE RECLASSIFIED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
WINDSOR INSURANCE	69547	Motor Liquidation Company	\$0.00 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
INFINITY INSURANCE #10000475918 PO BOX 830807 BIRMINGHAM, AL 35283			\$15,370.97 (P) \$0.00 (U)	\$0.00 (P) \$15,370.97 (U)		
Official Claim Date: 12/18/2009			\$15,370.97 (T)	\$15,370.97 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

**CLAIMS TO BE RECLASSIFIED**

89	\$19,389,220.67 (S)	\$0.00 (S)
	\$16,062.24 (A)	\$0.00 (A)
	\$22,350,503.13 (P)	\$0.00 (P)
	\$833,397.79 (U)	\$42,589,183.83 (U)
	\$42,589,183.83 (T)	\$42,589,183.83 (T)

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
In re : Chapter 11 Case No.  
: 09-50026 (REG)  
MOTORS LIQUIDATION COMPANY, *et al.*, :  
f/k/a General Motors Corp., *et al.* :  
Debtors. : (Jointly Administered)  
:  
-----x

**ORDER GRANTING DEBTORS' NINETY-EIGHTH OMNIBUS OBJECTION TO CLAIMS**  
**(Incorrectly Classified Claims)**

Upon the ninety-eighth omnibus objection to reclassify certain claims, dated September 21, 2010 (the “**Ninety-Eighth Omnibus Objection to Claims**”),<sup>1</sup> of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) [Docket No. 4180], seeking entry of an order reclassifying the Incorrectly Classified Claims on the grounds that each Incorrectly Classified Claim was incorrectly classified by the claimant, all as more fully described in the Ninety-Eighth Omnibus Objection to Claims; and due and proper notice of the Ninety-Eighth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Ninety-Eighth Omnibus Objection to Claims is in the best

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Ninety-Eighth Omnibus Objection to Claims.

interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Ninety-Eighth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Ninety-Eighth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each “Claim Amount and Priority” listed on **Exhibit “A”** (the “**Order Exhibit**”) annexed hereto is hereby reclassified as indicated on Exhibit “A” under the column “Modified Priority Status/Reduced Amount;” and it is further

ORDERED that, if applicable, the Ninety-Eighth Omnibus Objection to Claims is adjourned with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Adjourned*” (the “**Adjourned Claims**”) to the date indicated on the Order Exhibit, subject to further adjournments (such actual hearing date, the “**Adjourned Hearing Date**”), and the Debtors’ response deadline with respect to the Adjourned Claims shall be 12:00 noon (Eastern Time) on the date that is three (3) business days before the Adjourned Hearing Date; and it is further

ORDERED that, if applicable, the Ninety-Eighth Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Withdrawn*”; and it is further

ORDERED that, if applicable, the Ninety-Eighth Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Claim Withdrawn*” as those claims have been withdrawn by the corresponding claimant; and it is further

ORDERED that, with respect to this Ninety-Eighth Omnibus Objection to Claims, the Debtors reserve all their rights to object on any other basis to any Incorrectly Classified Claim; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object on any basis are expressly reserved with respect to, any claim listed on Exhibit "A" annexed to the Ninety-Eighth Omnibus Objection to Claims under the heading "*Claims to be Reclassified*" that is not listed on the Order Exhibit; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
\_\_\_\_\_, 2010

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United States Bankruptcy Judge